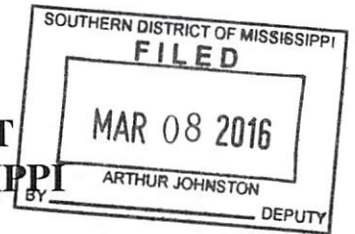


**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**



DOUGLAS HANDSHOE)
)
)
v.) CIVIL ACTION NO. 1:15cv382-HSO-JCG
)
VAUGHN PERRET, CHARLES LEARY &)
DANIEL ABEL, D/B/A/ TROUT)
POINT LODGE LTD OF NOVA SCOTIA)
& IN THEIR INDIVIDUAL CAPACITIES)
PROGRESS MEDIA GROUP LIMITED,)
MARILYN SMULDERS, TORSTAR)
CORPORATION, NATIONAL)
GEOGRAPHIC SOCIETY INC., XYZ)
FOUNDATION & JOHN DOES 1-50)
)

**UNOPPOSED MOTION OF PLAINTIFF FOR ADDITIONAL TIME
TO REBUT [36] DEFENDANT TORSTAR CORPORATION'S RESPONSE IN
OPPOSITION TO PLAINTIFF'S MOTION FOR LEAVE TO FILE AMENDED
COMPLAINT**

Plaintiff Douglas Handshoe moves the Court for three day's additional time, until and including Friday, March 11, 2016, in which to rebut [36] Defendant Torstar Corporation's Response in Opposition to Plaintiff's Motion for Leave to File Amended Complaint In support of its Motion, Plaintiff shows that he requires additional time to prepare his Rebuttal and that Defendant Torstar Corporation has no objection to the relief sought.

Respectfully submitted this 8th day of March, 2016,

Douglas Handshoe, Plaintiff
Post Office Box 788
110 Hall Street
Wiggins, MS 39577
(228) 284-0004
earning04@gmail.com

CERTIFICATE OF SERVICE

I, Douglas Handshoe, hereby certify that on March 8th, 2016 the foregoing was sent for electronically filing by me via the Clerk of the Court using the ECF system which sent notification to all counsel of record upon filing by the Clerk.

I, Douglas Handshoe, certify that on March 2, 2016 I have sent a true and correct copy of the foregoing to the following via United States Mail:

Daniel G. Abel
C/O The Super 8 Motel / Desai Enterprises
2421 Clearview Parkway, Room 106
Metairie, LA 70001

Vaughn Perret
189 Trout Point Road
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Progress Media Group Ltd.
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Marilyn Smulders
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Respectfully submitted this 8th day of March, 2016,



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